

8. There are also technical reasons why the collocater's transport equipment cannot be located in the same conditioned central office space as switches. First, switch equipment is tied to a distinctly different electrical ground than both transport and toll transmission equipment. The switch hardware requires an isolated electrical ground to prevent ambient voltages and stray current flows from damaging the integrated circuit boards. Toll transmission and transport equipment connect directly to an integrated electrical ground. Any personnel coming into contact with different grounds simultaneously could be seriously injured. Second, the environmental conditions of the switch area are required to be more controlled than that of transmission equipment. To ensure switch reliability, many of the larger switches require redundant heating, ventilation and air conditioning support systems.

9. Allowing collocators to place their equipment indiscriminately in any vacant central office space could lead to premature exhaustion of available cable support paths. As a matter of general practice, Verizon does not commingle fiber cables with communications cables and, as a rule, Verizon never commingles power cables with any other types of cabling. These practices require a three-tier cable support structure. Because central office space environments are required to be structurally hardened to nearly twice the floor loading of standard office space, the number of core drills and cable openings that can be performed in these floors is limited. Verizon already has existing central offices where no additional openings can be performed and existing cable support is at capacity.

**IV. The Incumbent Local Exchange Carriers Have Legitimate Needs For Security That Justify Placing Collocation In Separate Rooms Or Floors.**

10. Verizon's experience with collocation over the last 8 years demonstrates why collocation poses significant security concerns, which can best be met by placing collocation in separate rooms or floors, or with some other type of physical barrier.

11. As is shown in attachment B-1, numerous security incidents have already arisen in the context of existing physical collocation arrangements. These violations include unauthorized entry into central office space, theft of equipment, cables cut on frames, door locks and card readers destroyed, no identification card or use of another's identification card, doors propped open or locks taped, drug use, and other improper behavior. For example, in March 1998, two collocater employees broke a lock and entered the power room in a Verizon central office. They attempted to work on Verizon power distribution equipment, creating a serious safety risk as well as the potential for widespread service interruptions. In another incident, a collocater experienced a power outage at its collocation space. In an attempt to "isolate" the condition, the collocater employee breached Verizon's security and attempted to isolate the trouble by working at Verizon's main power distribution panel. Fortunately, neither one of these attempts to work on Verizon power equipment resulted in injury to the workers or caused damage to the network.

12. Disrupting existing service in a particular central office could put lives at risk. Many of Verizon's central offices house tandem switches, as well provide 911 services. Some offices house the Signal Transfer Point switches that are the lifeline to numerous subtending switches throughout the LATA. If these switches were damaged,

or the central offices housing these switches were otherwise compromised, lives could be lost and financial implications to major businesses could run into millions of dollars.

13. The security concerns of customers that depend on the security and reliability of Verizon's network, as well as other collocators, must be considered. Verizon provides telecommunications services to major business customers, as well as governmental agencies that have varying degrees of security concerns. Some of Verizon's larger customers have required a network security analysis of the equipment supporting their telecommunications requirements in central offices, which has included site visits to Verizon central offices.

14. Requiring the incumbent local exchange carrier to place collocated equipment in the same room as the incumbent's own equipment, without any wall or security barrier, would create unnecessary risks to the safety and reliability of the network. The Commission's rules require the incumbent local exchange carrier to allow a collocator access to its equipment 24 hours a day, seven days a week. This unrestricted access combined with commingling of collocator equipment with the incumbent's creates enormous security risks. There are existing equipment areas where Verizon employees are restricted from entering, except for those employees that have been properly trained to work on the equipment. In addition, Verizon has always required its own vendors to adhere to Verizon "Safe Time" policies which prohibit installation activities are within close proximity to working equipment except during late evening to early morning hours (typically 11:00 PM to 7:00 AM). These policies are in place to insure that any accidental disruption to working equipment would have minimal impact on consumers.

Both policies would be violated if collocator equipment were commingled and collocator personnel could access that equipment any time of the day.

15. Another operational concern for overall network reliability is the amount of increased foot traffic that would be generated in a commingled environment. The incumbent local exchange carrier has no control over the skill, training, or security sensitivity of the collocators' employees. With over 100 different collocators, the sheer number of unfamiliar personnel accessing the central office increases the probability of accidents, mistakes, and outright wrongdoing.

16. Furthermore, in order to provide timely maintenance for its own services, Verizon must leave test equipment and spare equipment in the open for immediate access by its employees. These test sets can cost up to \$60,000 and some of the circuit packs have a value of \$1,000 to \$17,000 each. Many of the collocators use the exact same test sets and telephone equipment, which presents an added risk of misappropriation of Verizon's equipment. In a recent case in Maryland, Verizon identified that a collocator had placed Verizon plug-ins in the collocator's equipment shelves. Whether such acts are inadvertent or intentional is not the issue. The issue is the increased exposure to financial harm and damage to Verizon's network. If an incumbent local exchange carrier were to allow unrestricted access to areas housing its equipment, there would be an increased opportunity for these types of security breaches.

17. There is no need to compromise Verizon's security by commingling collocator equipment in Verizon's space when there is a greater proportion of unused space in the collocation areas than in areas housing Verizon's equipment. Attachment B-2 shows that the collocators utilize approximately 30% of the space assigned to them.

Attachment B-3 illustrates the amount of unused space in typical collocation arrangements. Moreover, the collocation areas normally are secured, with entry limited to collocators with magnetic cards, and each collocator has the option of securing its own equipment in a cage. Similar security arrangements for Verizon's equipment would not be possible if commingling were required.

**V. Commingling of Collocator Equipment In The Same Racks Or Bays As The Incumbent Local Exchange Carrier's Equipment Would Impair The Security And Reliability Of The Incumbent's Network.**

18. If a collocator's equipment were placed in a rack next to Verizon's equipment, or within the same rack housing Verizon equipment or other collocators' equipment, it would be impossible to provide adequate security for Verizon's facilities. As discussed in Mr. Maples declaration, video surveillance alone would be ineffective, because when equipment is located in the same or adjacent bays, it is virtually impossible for an on-camera view to show on which piece of equipment a technician is working, let alone whether the technician has made inadvertent or intentional contact with equipment in an adjacent bay. In addition, while video surveillance alone provides some deterrent to interference with Verizon equipment, for the most part, it can only help determine accountability after the damage is done.

19. Commingling of collocator transport equipment in the same racks or bays as Verizon's equipment also poses physical incompatibility problems. The majority of Verizon equipment bays are deployed in standard relay racks housing equipment that is 12 inches deep. A typical 12-inch equipment lineup does not have adequate aisle spacing to house the collocators' equipment. Much of the equipment deployed by collocators

exceeds the maximum 12-inch depth, and collocators will typically mount complements of equipment in individual bays that have varying depths. Attachment B-4 provides examples of the type of equipment configurations that are deployed by collocators.

When Verizon implemented its cageless collocation offerings, it considered the equipment configurations of existing collocators and established a footprint to house equipment and/or cabinet enclosures in 22-inch line-ups. In addition, some collocators house equipment in locked cabinets that exceed the 22-inch standard cageless line-up.

20. Sharing of DC power distribution between Verizon and collocator equipment in the same rack or bay is not practical, as Verizon would have no control of the actual power drain of each piece of equipment. Power is provided through fused leads, typically for equipment in several bays of equipment. Allowing multiple parties to draw power from the same fused source would create conflict and the potential for exceeding the fuse capacity.

21. Commingling of collocator equipment in the same racks or bays also would make Verizon's network subject to any deficiencies in the collocators' installations. Currently, the Commission's rules prohibit the incumbent local exchange carrier from imposing performance requirements on the collocator's equipment. The separation between incumbent's local exchange carrier's equipment and the collocator's helps protect the incumbent's network from improper installations or other shortcomings in the collocator's arrangements. However, if collocators were to install equipment above and below the incumbent's on the same rack or bay, faulty installation could directly affect the reliability of incumbent's services. This problem is illustrated in Attachment B-5, which provides photographs of collocator installations that do not meet

Verizon standards. Commingling would impair the reliability of the incumbent local exchange carrier's network unless the Commission allowed the incumbent to supervise and control the collocator's installation and maintenance work.


22. In addition, Verizon must be able to protect its own equipment without having to resort to massive reconstruction and reengineering. It is not technically feasible for Verizon to place locked cabinets around its imbedded equipment without moving equipment to make space for such cabinets and without reconstructing the entire heating, ventilation, and air conditioning system.

## **VI. Conclusion**

23. For the foregoing reasons, commingling of collocator equipment with Verizon's equipment would pose unacceptable and unnecessary risks to the security and reliability of Verizon's network.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 11, 2000

  
Michael D. Poling



OPERATIONAL AND SECURITY ISSUES IN BELL ATLANTIC CENTRAL OFFICES WITH COLLOCATION				
CLEC/Vendor	State	Location	Date	Occurrence
	MD	2455 Colesville Road	13-Sep-95	At approximately 10:00 a.m., BA began receiving alarms and trouble reports on services supported by 2 OC3 fiber multiplexers. The root cause analysis was proven to be a foreign liquid substance that came from the conduit connecting the [ ] equipment room (above) to the BA equipment room (below). Two DDM 2000 muxes and supporting power were destroyed and required total replacement. BellCore analysis: Samples analyzed using a gas chromatograph/mass spectrometer (GC/MS) indicated the presence of urea and creatinine, which are major constituents of urine. The ratio provided a high degree of confidence in identifying the contaminant as urine. None of the equipment was salvageable.
	MD	Montrose	3-Jun-96	[ ] core drilled the serving central office manhole to place fiber without BA permission or knowledge and in direct violation of BA policies. The unauthorized encroachment narrowly missed cutting into BA fiber cables in the manhole which could have caused major service outages and FCC reportable outages.
	MD	Montrose	3-Jun-96	Illegal core drilling in BA manhole narrowly missing BA cables.
	NJ	Newark	10-Sep-97	BA technician observed 3 [ ] employees in the Main Distribution Frame area of the central office. This is restricted access, which entry was gained through a unican (cipher lock). [ ] employees were using BA's telephone. Employee later observed removing a telephone set from a locker in the same restricted area and were challenged by a BA employee. Potential theft of BA property.
	MD	Salisbury	1-Oct-97	Illegal core drilling in BA manhole.
	PA	Lancaster	6-Jan-98	Lancaster CO is a keyed lock. Collocation admittance log shows that [ ] from [ ] entered the collocation area for the purposes of doing testing. The employee has never applied for a BA non-employee ID (Log for 1/6,8 & 11
	MD	Gaithersburg	28-Mar-98	Saturday, BA COT found two [ ] employees in the power room. BA employee challenged the CLEC and they said they were going to fuse the power to the cage. Door lock from collo room to power room breached. CLEC employees attempting to work on BA owned equipment and the potential to service interruptions to BA customers existed.
	MD	Glen Burnie and Cockeysville	6-Apr-98	[ ] regional director of operations stated to the Commission that he was unable to obtain access to the Glen Burnie physical collocation site. A review of records indicated that [ ] had never applied for a BA non-employee ID badge and access card and was attempting to use the card of [ ] of [ ]. Giving cards to other individuals as well as entering BA premises without a BA non-employee ID badge w/o an escort are both violations of BA security practices.
	BA	All [ ] cages	6-May-98	BA observed that [ ] has installed Harris test units in all physical collocation arrangements. These installations were done absent a Methods of Procedure (MOP) and absent any supporting documentation demonstrating the equipment had been tested to meet NEBS. A subsequent review identified that the equipment had never been tested to NEBS standards and upon testing in July, actually failed EMI emissions standards. Power was removed from all equipment and replacement units were installed with the correct vendor modifications. Failure to conform to NEBS jeopardizes the integrity of the network equipment in the premises.
	PA	Lancaster	30-Dec-98	Lancaster CO is a keyed lock. Collocation admittance log shows that [ ] from [ ] entered the collocation area for the purposes of doing inventory. The employee has never applied for a BA non-employee ID
	PA	Lancaster	5-Jan-99	Lancaster CO is a keyed lock. Collocation admittance log shows that [ ] from [ ] entered the collocation area for the purposes of doing testing. The employee has never applied for a BA non-employee ID. All employees entering a BA CO are required to prominently display proper identification to ensure authorized access to the premises.
	MD	MD	13-Jan-99	Illegally attached to 48 BA poles with fiber cable in the Elkton area
	VA	Barcroft	15-Jan-99	Barcroft central office. Manager from neighboring business approached BA to complain about trash and wire scrap being thrown in his recycle dumpster. Advised BA that there can be a \$10,000 fine assessed for illegal trash in a recycle dumpster. BA contacted the BA vendor doing work in the central office and advised them to remove the trash immediately. The BA vendor found that the dumpster was overflowing with material that was clearly marked [ ]. The BA vendor is requesting who to bill the labor hours to for the removal of the debris. Jeopardizes the business relationship between the business customer and BA.

OPERATIONAL AND SECURITY ISSUES IN BELL ATLANTIC CENTRAL OFFICES WITH COLLOCATION				
CLEC/Vendor	State	Location	Date	Occurrence
	VA	Arlington	19-Jan-99	A [ ] employee was in the Arlington CO with no identification. Employee was asked to leave. CRAS log shows [ ] card was used to gain entry at 11:38:06 am. Alleged thefts in this central office reinforce the need for proper security.
	VA	Arlington	19-Jan-99	BA Manager was checking on cages in progress for applications at Arlington. [ ] employee approached him and said his key card was not working properly. Individual did not have any BA identification. He said he was a former [ ] employee and that he just got his pass today. When asked how he gained entry to the building, he said he was using [ ] key card. Security log indicates that [ ] used [ ] key card at 08:35:36 a.m. to gain access. BA security requires that key cards are to be used solely by the employee they are issued to. BA requires all employees to properly display identification. BA has no assurance that the key card is a lost or stolen card and access is by an unauthorized individual with unknown intentions.
	MA	Watertown	21-Jan-99	[ ] leaving rubbish in the collocation area of the Watertown central office. This was a repeat occurrence. Poses a fire hazard risking human lives and network integrity.
	MA	Watertown	21-Jan-99	Trash left in caged area. [ ] vendor notified and did not remove it. Letter sent to [ ]. Fire hazard.
	VA	Falls Church	22-Jan-99	[ ] was attempting to gain access to the Falls Church central office. He contacted BA security. When asked for the key card number, it was determined that the card he was attempting to use was not issued to him but to [ ], another employee of [ ]. When CLECs apply for a key card, they "agree to accept responsibility for protection and proper use of the card and assure that it will be used <u>only</u> by me in.....I understand that improper use of this card in any way may result in possible termination of contract or legal action." The security log shows that attempts were made to gain entry in restricted areas. Access to restricted areas jeopardizes the integrity and confidentiality of BA's network.
	MD	Silver Spring	23-Jan-99	Silver Spring, Saturday. The LCC manager was working the weekend to review progress of pending jobs. A [ ] employee was in the cage and had no identification. When asked where his ID was, [ ] of [ ] said he was there to test with a [ ] employee at Alexandria. When asked how he gained access to the central office, he said another employee dropped him off and let him in while he went to other locations to test. The [ ] card access used by another [ ] employee to let [ ] in the building was assigned to [ ]. Access was gained at 07:18:07 a.m. The BA manager stayed with [ ] until he completed his test. (The actions delayed the BA manager from completing the tasks he was doing on a non scheduled weekend without pay that included [ ] cages in progress at other central offices). Unauthorized entry to a BA premise is a violation of BA security practices. BA has no way of identifying if employee is a [ ] employee.
	VA	Barcroft	26-Jan-99	BA contacted vendor removing heavy debris from the collocation room by tossing off the roof. When asked to cease the safety violation, he became belligerent. The employee is barred from working in BA CO's. Safety of individual harm.
	VA	Arlington	27-Jan-99	[ ] E Mail from [ ] expressing concern about illegal entry in the cage and allegedly a ladder stolen from the cage. [ ] claims they found unauthorized people in the cage, but did not identify by name and company.
	DC	Metro	27-Jan-99	[ ] E Mail from [ ] expressing concern about illegal entry in the MO cage. [ ] claims they found unauthorized people in the cage, but did not identify by name and company. Jeopardizes the network integrity of CLEC equipment.
	VA	Arlington	28-Jan-99	[ ] of [ ] contacted BA's Network operations center at 10:30 a.m. to report missing items from the [ ] work area at the Arlington central office. He reported a missing Multimeter (\$280), a missing COAX kit (\$150). He discovered it missing at 8 a.m. There was a cardboard sign inside the [ ] cage stating, "if you stole a multimeter, coax kit and bandsaw, return it or security will be called". BA initiated an internal investigation. Multiple CLEC activity was in progress at the time of the alleged incident.
	MD	Silver Spring	28-Jan-99	Vendor [ ] was observed using a cellular phone in the cage. Sign on entrance way clearly prohibits use in the building. Frequencies emitted by cellular phones can interrupt CPU's of switching and transmission equipment.

OPERATIONAL AND SECURITY ISSUES IN BELL ATLANTIC CENTRAL OFFICES WITH COLLOCATION				
CLEC/Vendor	State	Location	Date	Occurrence
	MD	Beltsville	1-Feb-99	Two employees were accessing the collocation space by entering the central office. Access to the collocation space is through the front door. The BA technician challenged the two employees. Only one individual, [ ] of [ ] had proper identification. BA has alarmed doors to prevent unauthorized entry to central office space. Unidentified people in BA premises is a violation of BA security standards. Access to restricted areas jeopardize the network integrity and confidentiality of BA premises.
	MD	Berwyn	1-Feb-99	BA has taken initiatives to alarm interior doors to help prevent continued unauthorized access in restricted areas of the central office. Access to restricted areas jeopardize the network integrity and confidentiality of BA premises.
	MD	Hyattsville	1-Feb-99	BA has taken initiatives to alarm interior doors to help prevent continued unauthorized access in restricted areas of the central office. Access to restricted areas jeopardizes the integrity and confidentiality of BA's network.
	DC	Southwest	1-Feb-99	Vendor drilling in floor of cage for mounting bays of equipment. Was not using proper vacuum (HEPA). Fire alarm activated resulting in approximately 40 BA employees evacuating the building for approx. 20 minutes. Able to defer dispatch of the fire department. (Not following Engineering IP.) Lost man hours to BA employees addressing the incident exceeded 16 hours total time. Illegal operations and excessive dust jeopardized the operating equipment in the collocation room.
	VA	Arlington	2-Feb-99	On February 2, a BA technician found two [ ] technicians on the second floor in Arlington looking at the Digital Cross-Connect System (DCS). When challenged, the individual said he was looking for a T-Bird test set to turn up a T1. One employee is the same technician that was confronted in December wandering in BA space and was advised then that he was in a restricted area and shown how to access the collocation area. He did not have the BA \$77,000 piece of test equipment because it was being used by another BA technician. The DCS is the heart of all transport out of this major switching center. The BA technician voluntarily assisted the [ ] tech in testing the T1. Potential theft of BA property.
	VA	Arlington	3-Feb-99	CO supervisor requested 3 [ ] employees working in the collocation room to display the BA non-employee ID badges. On second visit, only one employee still present [ ], who was still not displaying his ID. Disregard for basic security procedures jeopardizes network integrity.
	VA	Arlington	3-Feb-99	[ ] dumping all debris cables and boxes in [ ] cage. Pictures with [ ] labels on the boxes. [ ] previously denied trash in the cage belonged to [ ], even though the scrap COAX cable is stenciled [ ] and BA does not use [ ] coax, but all the coax terminations for [ ] POT Bay are [ ] COAX. Risk of fire and safety of individual lives and network integrity.
	VA	Braddock Road	4-Feb-99	CO manager was visiting the Braddock Road central office and observed the front hallway door taped to prevent locking/latching. This is a violation of fire codes as doors are required to latch. It is not known who or exactly when the doors were taped. ([ ] and [ ] are only CLECs)
	VA	Fairfax	4-Feb-99	CO manager was visiting the Fairfax central office and observed the 1st and 2nd floor front hallway doors and the second floor collocation room door taped to prevent locking/latching. This is a violation of fire codes as doors are required to latch. It is not known who or exactly when the doors were taped.
	NY	Manhattan area	12-Feb-99	[ ] sent a letter to Account Management alleging vandalism and sabotage of [ ] cages in NYC. Investigation is in progress of the cut cables inside [ ] secured cage.
	DC	Woodley	17-Feb-99	[ ] vendors left trash in the common area of the Woodley Collocation space/ [ ] vendors continue to leave trash in the central office after repeated notification to [ ] of these violations. Not only does this create a fire hazard risking the lives of employees as well as jeopardizing the integrity of the network, it impedes the ability of other CLECs and BA vendors to work efficiently within the same area.
	DC	Woodley	17-Feb-99	Trash in collocation area. Fire hazard. CLEC notified
	PA	PA	19-Feb-99	Illegally attached fiber cables to 148 BA telephone poles. Illegally relocated BA fiber cables. Potential loss to thousands of customers.

OPERATIONAL AND SECURITY ISSUES IN BELL ATLANTIC CENTRAL OFFICES WITH COLLOCATION				
CLEC/Vendor	State	Location	Date	Occurrence
	DC	Woodley	20-Feb-99	BA technician entered the women's restroom and found a man in the restroom. The man was in a restricted area of the BA premises. When she challenged the individual to produce a BA identification badge, he showed another employees badge. Two other vendors were working in the collocation space and had no identification. All three were escorted off the premise. The employee that left his BA non-employee ID card and key card access was not at the BA premises. The vendor fired the employee that left his card access with another employee.
	MD	Beltsville	23-Feb-99	[ ] has paper trash inside the cage that has been there for more than a week. Other CLECs have visited the site to make sure all their own trash is removed. Leaving trash inside the cage presents a fire hazard.
	NY	42nd Street	24-Feb-99	BA technician observed an [ ] vendor in a secured area of the BA central office at 42nd street using a BA phone. The employee said he was in the area doing some sort of continuity testing at BA's battery distribution frame. The vendor was asked to leave. The CO manager later found the vendor and another employee back in the same restricted BA area again using the phone. The employees were asked to leave the premise. There were 4 phones that had been vandalized and were non repairable and the unican lock to the area had been damaged. Unrestricted access jeopardizes the network integrity, damage to BA property. The Battery distribution frame is BA equipment and unauthorized access to BA equipment jeopardizes service to multiple CLEC collocation arrangements as well as BA services.
	MD	Rockville	25-Feb-99	[ ] is sending their installation vendors to the Rockville central office without proper BA identification or card access. A BA technician found two employees in the corridor of the 2nd floor. Neither employee had identification. When asked how they gained access to this part of the building, they said they played with the numbers on the cipher lock until they gained access to the building. They were unable to gain access to any other part of the building or collocation room. BA disabled the unican lock to allow for card access only and advised [ ] to submit applications for proper identification and card access. Unauthorized access violates BA security practices and jeopardizes the integrity of CLEC and BA networks.
	MD	Silver Spring	11-Mar-99	Six empty relay rack boxes of trash left in Common area. [ ] notified of fire hazard 3/11
	MD	Silver Spring	11-Mar-99	Box of trash containing cables and empty shipping bags creating a fire hazard. Memo to [ ] on 3/11
	VA	Arlington	10-May-99	Trash in collocation area. Fire hazard. CLEC notified
	DC	Midtown	14-May-99	[ ] has AC powered modem in cge. No AC powered equipment permitted in collocation. [ ] installed without any NEBS documentation. Potential interference of other network equipment.
	NY	Bridge Street	21-May-99	Two CLEC employees attempted to gain access after hours (6 pm) at the CO. The guard would not grant access to the technicians because neither had a NY BA ID. One technician threatened the guards life. Reported incident to security. [ ] was escalating the no access issue to [ ] later that evening.
	DC	Southwest	14-Jun-99	[ ] technicians attempted to gain access without proper identification. The 24 hour guard did not give access because they could not produce a BA non employee ID. (6:30 a.m.)
	VA	Arlington	15-Jul-99	a gang box chained to a pole inside a locked cage was cut and removed. Loss of tools in the range of \$20,000. Reported to BA security.
	MA	North Framington	26-Jul-99	BA technicn observed an [ ] vendor from [ ] rummaging through a B desk in a restricted area of the BA central office. She followed him back to the [ ] cage and asked who he worked for. He said he did not know. When asked what his intentions were, he said he was looking for a patch cord. Another vendor was observed earlier in the day looking through BA plug-in boxes.
	DE	Wilmington	29-Jul-99	Trash (empty boxes) stored in collocation cage creating a fire hazard. Notified [ ] to have the hazard removed
	DC	Midtown	29-Jul-99	AC modems in [ ] cage. Another CLEC notified BA. [ ] advised of violation and no AC power or non NEBS approved equipment.
	PA	Pottstow	6-Aug-99	[ ] vendor [ ] using cellular phone in CO space. Advised [ ] of [ ].
	DC	Midtown	8-Aug-99	Trash (empty boxes) stored in collocation cage creating a fire hazard. Notified CLEC to have the hazard removed
	DC	Midtown	8-Aug-99	Trash (empty boxes) stored in collocation cage creating a fire hazard. Notified CLEC to have the hazard removed

OPERATIONAL AND SECURITY ISSUES IN BELL ATLANTIC CENTRAL OFFICES WITH COLLOCATION				
CLEC/Vendor	State	Location	Date	Occurrence
	DC	Midtown	8-Aug-99	Trash (empty boxes) stored in collocation cage creating a fire hazard. Notified CLEC to have the hazard removed
	VA	Pemberton	11-Aug-99	removed BA cables from POT bay to connect directly to [ ] cage. Notified both CLECs of violation
	MA	Natick	12-Aug-99	CLEC continues to use cellular phones in CO after repeated warnings. Notified [ ] of [ ] of violations.
	VA	Arlington	27-Aug-99	[ ] working on POT bay and talking on cellular phone (NOTE: BA STP switch adjacent to collocation room). Not displaying ID. Had [ ] with her. Notified CLEC of security and safety violations.
	VA	Arlington	27-Aug-99	Trash, empty boxes in caged area. Fire hazard. Notified CLEC
				[ ] observed a CLEC attempting to gain access to the BA secured area. [ ] noticed the BA ID picture did not match the employee. The ID belonged to a [ ], but the individual for [ ] was [ ]. [ ] stated he did not go to BA to get his picture taken yet. Giving access cards or ID badges to another employee is a violation of B security practices and the terms the individual agreed to when access cards and IDs are issued. Reported to [ ] and BA security.
	MD	Beltsville	10-Sep-99	[ ] of [ ] doing acceptance walkthrough with [ ]. [ ] left collocation area for a moment. Upon return [ ] was talking on cellular phone. Reminded of signs on door and prohibited use in CO
	PA	Bala Cynwyd	15-Sep-99	[ ] of [ ] doing acceptance walkthrough with [ ]. [ ] left collocation area for a moment. Upon return [ ] was talking on cellular phone. Reminded of signs on door and prohibited use in CO. Second time in same day. Letter sent.
	PA	Ardmore	15-Sep-99	[ ] of [ ] doing acceptance walkthrough with [ ]. [ ] left collocation area for a moment. Upon return [ ] was talking on cellular phone. Reminded of signs on door and prohibited use in CO. Second time in same day. Letter sent.
	MA	Bowdoin St.	17-Sep-99	Roaming in unauthorized areas.
	PA	Lancaster	21-Sep-99	Sign in log indicates [ ] is accessing cage by employees not having approved BA ID. One is former employee dismissed by BA.
	NY	79th St. NW	24-Sep-99	Vandalism of [ ] cage.
	NY	Queens - Bayside		Vendors for [ ] accessing CO without BA ID. Sent letter to [ ] of [ ]
	MD	Armiger	6-Oct-99	[ ] is vendor doing installation work at the CO. Observed by [ ] driving across the grass area of the funeral home parking lot to get to the BA parking lot causing damage to the customer premises grounds.
	NJ	Journal Sq-1	20-Oct-99	[ ] on premises with no ID cards or swipe cards.
	NJ	Mount Holly	23-Oct-99	2 [ ] vendors working for [ ] in BA restricted space. [ ] dismissed the employees. Letter to [ ]
	NY	Cicero	25-Oct-99	Doors left propped open. Advise CLEC this is a violation of security.
	NY	Clay	25-Oct-99	Doors left propped open. Advise CLEC this is a violation of security.
	NY	North Syracuse	25-Oct-99	Doors left propped open. Advise CLEC this is a violation of security.
	MA	Lowell	26-Oct-99	[ ] vendor [ ] (2 employees) no BA identification. One tech became belligerent and verbally abusive.
	NJ	Cranford	29-Oct-99	[ ] observed wandering around in BA secured area. Escorted back to collocation space.
	MD	Elkridge	29-Oct-99	[ ] reported theft of ADSL card valued at \$500 sometime between 10/14 and 10/18. Reported to BA security.
	RI	Pawtucket	29-Oct-99	Two BA tech went to CO and observed 2 [ ] techs in BA secured space (3-4 am). Unmanned office, and the two [ ] techs were only ones in building. Smell of cigarette smoke. Reported to management and [ ] notified.
	MA	Wooster	2-Nov-99	[ ] not displaying proper BA ID.
	MA	Taunton	3-Nov-99	Hostile person in building without ID.
	MD	Ellicott City	3-Nov-99	Employee working in [ ] cage in CO with no BA identification. Escorted off the premises.
	PA	Penn Hills	4-Nov-99	[ ] cage door found open.
	NY	Syracuse	5-Nov-99	Unauthorized entry.
	NY	Oswego	5-Nov-99	[ ] found in BA secured space. Notified [ ] of violations.
				[ ] invited the non [ ] employees, for a tour of the SW central office. Violation of tariff. [ ] advised that ALL CLEC employees and agents must display a valid BA non employee ID, and [ ] is not authorized to give access to a non BA approved individual to a BA premises.
	DC	Southwest	8-Nov-99	
	NY	37th St.	10-Nov-99	Unauthorized access to virtual collocation.

OPERATIONAL AND SECURITY ISSUES IN BELL ATLANTIC CENTRAL OFFICES WITH COLLOCATION				
CLEC/Vendor	State	Location	Date	Occurrence
	NH	Nashua	10-Nov-99	4 [ ] employees working in CO, One without BA identification. Was asked to leave and came belligerent and said he does not have to leave because they have equipment in the building and BA could call the police. [ ] advised of BA Security requirements
	NJ	Mt. Holly	12-Nov-99	[ ] employees in building without BA ID.
	NJ	Cranford-1	18-Nov-99	Unauthorized Entry.
	NY	E 79th Street	18-Nov-99	3 cables cut on collocators frame. Reported to BA security.
	MA	Worcester-1	23-Nov-99	Entry Prohibited.
	NY	18th St.-1	29-Nov-99	Power line in cage cut.
	NY	37th St.	1-Dec-99	Vandalism.
	NJ	Closter-2	3-Dec-99	Cage broken into.
	NJ	Closter-1	6-Dec-99	[ ] technicians roaming the building.
	MA	Worcester-1	6-Dec-99	Door lock taped.
	NY	30th St.-1	8-Dec-99	[ ] employees in building without BA ID.
	PA	Lancaster-2	9-Dec-99	Door propped open.
	VA	Vienna	9-Dec-99	[ ] of [ ] insisted on trying to gain access to virtual collocation equipment. [ ] advised of BA policy.
	NJ	Hackensack	12-Dec-99	[ ] is on the first floor and employees are coming to the fifth floor. [ ] is outside of the area they are supposed to be in.
	NJ	Ewing	6-Jan-00	[ ] using a cellular phone in collocation space. Cellular phones can disrupt switch processing.
	NJ	Mount Holly	8-Jan-00	[ ] and another [ ] employee were working in the [ ] cage. The other [ ] employee was using a cellular phone and ducked behind a bay. [ ] advised him to turn it off. Occurred after multiple notifications to [ ]. Cell phones can disrupt switch processing.
	DC	Downtown	10-Jan-00	[ ] cut two dial tone administrative lines that BA installed for [ ] in [ ] area and moved the lines to [ ] bays. [ ] notified of incident, and BA had to rerun [ ] connections.
	ME	Brunswick	11-Jan-00	BA employee entered rest room on the first floor and confronted two vendors working for [ ]. The restroom reeked of marijuana. Incident reported to security.
	PA	Wilkes Barre	17-Jan-00	Two [ ] employees in BA secured area, One with no ID and the other using a cellular phone.
	NJ	Haddonfield	17-Jan-00	[ ] vendor inadvertently cut 900 pairs of [ ] cables to relocate to the [ ] cage disrupting [ ] service to end user customers.
	NJ	Englewood-1	20-Jan-00	[ ] technician using BA space.
	MD	Temple Hills	24-Jan-00	Security observed two CLEC contractors in a BA secured stairwell. When challenged, they stated they had never seen the inside of a CO and wanted to just look around. They were escorted back to their designated area.
	MD	Parole	27-Jan-00	Unauthorized Entry.
	VA	Foxmill	27-Jan-00	\$2,500 BA trumpeter Coaxial crimp kit missing over weekend. Second reported loss in 3 months. Turned over to BA security and reported to police.
	NY	West Statenis	11-Feb-00	Unauthorized Entry.
	NY	Staten Island	11-Feb-00	[ ] and [ ] have been entering and walking around the common area and should not be there.
	NY	Long Island City	14-Feb-00	Theft.
	MA	Lexington-1	17-Feb-00	[ ] replaced blown fuse on BA BDFB.
	PA	Conshohocken	22-Feb-00	[ ] vendors in unauthorized area.
	VA	Brickell Rd.	2-Mar-00	Cable damaged.
	NJ	Rochelle Park	3-Mar-00	Unauthorized Entry.
	MA	Boston	7-Mar-00	Holding elevator doors open.
	ME	Waterville	7-Mar-00	Unauthorized access card use.
	MA	Brockton-1	10-Mar-00	Theft.

OPERATIONAL AND SECURITY ISSUES IN BELL ATLANTIC CENTRAL OFFICES WITH COLLOCATION				
CLEC/Vendor	State	Location	Date	Occurrence
	PA	Bryn Maur	9-Mar-00	[ ] tech gained access to CO without displaying ID.
	NY	Hempstead	14-Mar-00	Breaking and Entering at CO.
	MA	Tauton	16-Mar-00	Collo door left open.
	MD	Churchville	17-Mar-00	Possible vandalism.
				CO technician [ ] observed a CLEC wandering through the equipment aisle in BA restricted space. When challenged, the individual stated he was looking for a fuse as one of the fuses in the CLEC equipment had blown. He also entered the business office area asking for [ ]. Further investigation to follow to identify the name of the individual and the CLEC. At this time, [ ] occupy physical collocation space.
	DE	Pennrose	31-Mar-00	Broken doors to CLEC area.
	VA	Arlington	4-Apr-00	Theft.
	ME	Portland	6-Apr-00	Theft.
	VA	Virginia Beach	7-Apr-00	[ ] tech on BA premises without ID.
	MA	Lexington-1	13-Apr-00	[ ] working on BA equipment.
				[ ] reported service outage in CO due to a [ ] vendor dropping a cable rack in the POT bay. Damages to live service on 3 DS3's and additional damage to CLEC provided coax to the 5 additional cross connects. [ ] was doing equipment install for [ ] bay in close proximity to the POT bay. CCC report with pictures of damage.
	MA	Billerica	14-Apr-00	Unauthorized Entry.
	DE	Pennrose	18-Apr-00	Wrong type of cable run on BA racks by [ ].
	MA	Malden	18-Apr-00	Theft.
	NY	Westbury	20-Apr-00	[ ] used an H tap to cable DC power from a #6 feed down to a #10 feed violating fusing where the smaller #10 wire could serve as the fuse creating a potential fire hazard. CCC ticket initiated.
	NY	All Offices	20-Apr-00	Unauthorized Entry.
	VA	McLean	11-May-00	[ ] tech and vendor working at [ ] on 5/7. Subsequent to this, the [ ] vendor [ ] was observed testing on the [ ] at 7 p.m. BA escorted the tech out of the BA restricted space and key card access was deactivated until written assurance from [ ].
	VA	Lewinsville	17-May-00	[ ] experienced a power failure on one 200 amp feed. The [ ] technician entered BA restricted space and performed testing on BA Power Distribution Panel (PDB). Investigation in progress.
	PA	Chester A	16-May-00	[ ] filling up dumpster with trash every other day. CCC advised and ticket issued to have [ ] follow IP72201 engineering practices.
	VA	Herndon	16-May-00	Modem line disconnected.
	VA	Virginia Beach	30-May-00	Cage door open.
	NY	White Plains	7-Jul-00	Theft.
	NY	White Plains	12-Jun-00	[ ] would not comply with rules.
	PA	Chester A	16-Jun-00	Unauthorized entry.
	MA	Worcester-1	22-Jun-00	Power disconnected.
	NY	Bridge St.	23-Jun-00	[ ] collocators seen on BA side of CO.
	ME	N. Dearing	3-Jul-00	Cable damaged during installation.
	NY	Albany	19-Jul-00	[ ] not following rules.
	NJ	Lansdowne	21-Jun-00	Unauthorized Entry.
	NY	Tiebout Ave.	13-Jul-00	Unauthorized Entry.
	MD	Northeast	19-Jul-00	[ ] tapping phone lines.
	MA	Lawrence-1	2-Aug-00	[ ] using phone service of [ ].
	MA	Malden	4-Aug-00	Lock off cage door.
	MA	Marlboro-1	15-Aug-00	

OPERATIONAL AND SECURITY ISSUES IN BELL ATLANTIC CENTRAL OFFICES WITH COLLOCATION				
CLEC/Vendor	State	Location	Date	Occurrence
	NJ	Irvington	16-Aug-00	[ ] reported that [ ], Verizon Team Leader, had asked two techs from [ ] to leave the building. They were removing Verizon ladders and using 2-way radios/phones. They also had the doors propped open.
	NY	50th St.-1	18-Aug-00	Anonymous phone threat received.



Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

In the Matter of	)	
	)	
Deployment of Wireline Services Offering	)	CC Docket No. 98-147
Advanced Telecommunications Capability	)	
	)	
and	)	
	)	
Implementation of the Local Competition	)	CC Docket No. 96-98
Provisions of the Telecommunications	)	
Act of 1996	)	

**ATTACHMENT B-2 TO THE DECLARATION OF MICHAEL D. POLING**

1. For purposes of determining the percentage of collocation space that is currently in use, Verizon surveyed more than 6,000 completed collocation arrangements in Verizon east. The results of this survey, shown below in the table and chart, demonstrate that less than 30% of the total space allocated for physical collocation is occupied by equipment bays housing working equipment.

2. The low utilization of space currently allocated to collocators is contributing to the premature of exhaust of total available space to house working equipment. In addition to the fact that less than 30% of the space allocated to collocators contains bays with working equipment, the number of equipment bays housing only one shelf of equipment reflects even a lower utilization of the available space. In many situations, equipment that is fragmented in 5 or more equipment bays could be placed in as few as one or two equipment bays.

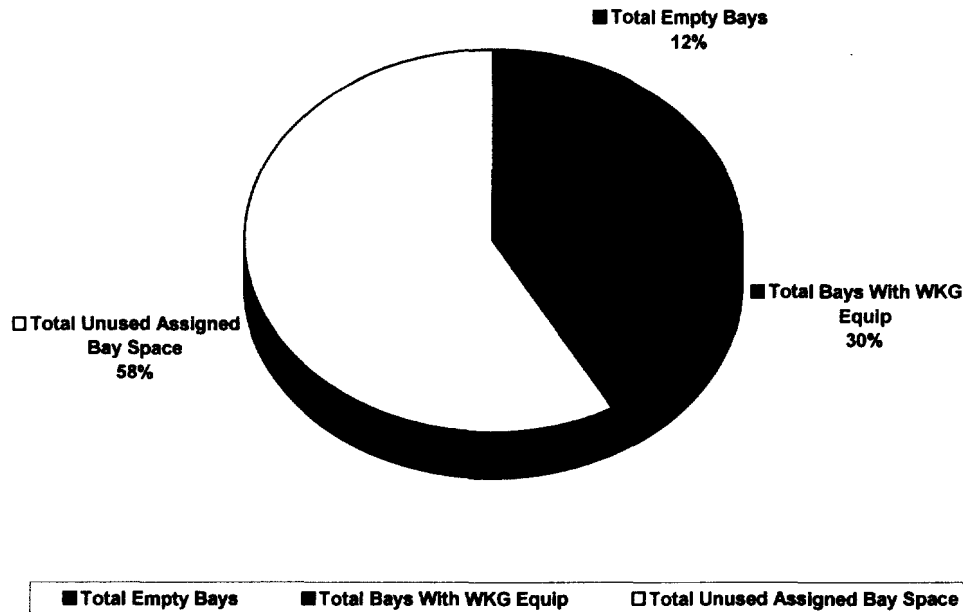
3. While the average collocator has space for 7.5 bays, the average number of equipment bays with working equipment per collocator is 2.2 bays. The

amount of unused space that has been assigned to existing collocators would allow others to install approximately 32, 000 bays in these offices surveyed. This shows that there is no need to compromise the security of Verizon's network by placing collocator equipment next to Verizon's equipment when there is plenty of space available that has already been assigned to collocation. Moreover, the inefficient use of existing space by collocators is the primary reason for shortages of space to accommodate new collocation requests.

4. The inefficient use of space cannot be contributed to newly installed arrangements. Many of the collocation arrangements pictured in Attachment B-3 have been in place for months, and in some cases for over a year, with minimal change to the initial deployment of equipment. It is unlikely that there will be any significant changes to overall utilization in the near future. The actual inventory of working circuits to the various collocation arrangements is low. Verizon has provisioned almost 8 million cross connects to these collocation arrangements and a significant number of digital cross connects. In all cases, overall utilization is low in every jurisdiction, as is shown below.

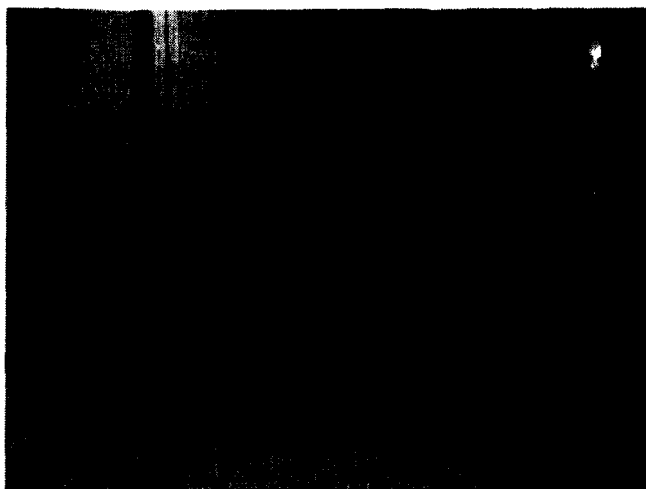
<b>Verizon east</b>					
<b>Voice Grade and Digital Cross Connect Utilization</b>					
SO	IN	DS1s Installed	466,755.00	DS3s Installed	110,115.00
DS1	IN	DS1s In Use	32,623.00	DS3s In Use	12,756.00
DS1	IN	DS1 % In Use	6.99%	DS3 % In Use	11.58%

### Utilization of Assigned Collocation Space Verizon east central offices

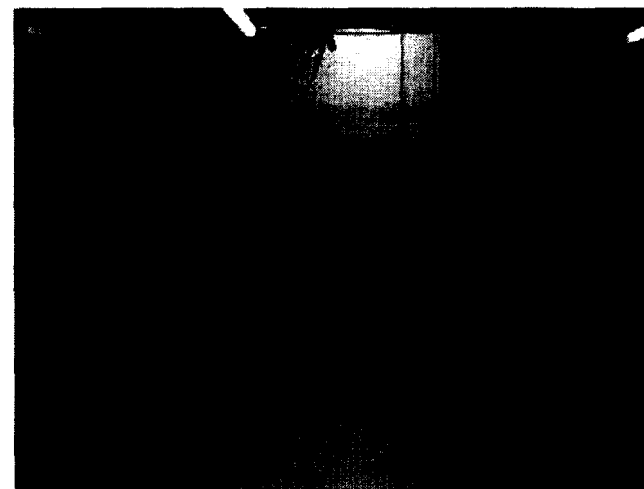


	Total CLEC Sites Surveyed	Total Cage Space Assgn SQ. ft.	Total SCOPE / CCOE Bays Assgn	Total Bay Space Assgn Capacity	Total Empty Bays	Total Bays With WKG Equip	Total Unused Assigned Bay Space	Avg Wkg Bays per CLEC	Avg empty bays per CLEC	Avg Total Bays Assigned per CLEC
CT	13	1,500	18	118	0	45	73	3.5	0.0	9.1
DE	160	16,700	375	1,711	180	503	1,028	3.1	1.1	10.7
MD	41	6,350	189	697	67	245	385	6.0	1.6	17.0
MA	873	18,539	305	1,788	175	586	1,027	0.7	0.2	2.0
ME	792	56,050	1,701	6,185	667	1,650	3,868	2.1	0.8	7.8
NH	83	2,100	140	308	3	142	163	1.7	0.0	3.7
NJ	95	3,900	103	415	44	178	193	1.9	0.5	4.4
NY	1,039	62,040	2,551	7,514	895	2,363	4,256	2.3	0.9	7.2
PA	1,003	102,773	1,871	10,093	1,117	3,315	5,661	3.3	1.1	10.1
RI	1,106	100,515	2,535	10,576	1,457	2,412	6,707	2.2	1.3	9.6
VA	153	12,290	164	1,147	104	293	750	1.9	0.7	7.5
VT	637	29,600	2,238	4,606	728	1,646	2,232	2.6	1.1	7.2
WV	26	1,250	24	124	5	27	92	1.0	0.2	4.8
WY	58	2,000	154	314	98	141	75	2.4	1.7	5.4
<b>TOTAL</b>	<b>6,079</b>	<b>415,607</b>	<b>12,368</b>	<b>45,597</b>	<b>5,540</b>	<b>13,546</b>	<b>26,511</b>	<b>2.2</b>	<b>0.9</b>	<b>7.5</b>
				<b>%Total Space</b>	<b>12.15%</b>	<b>29.71%</b>	<b>58.14%</b>			

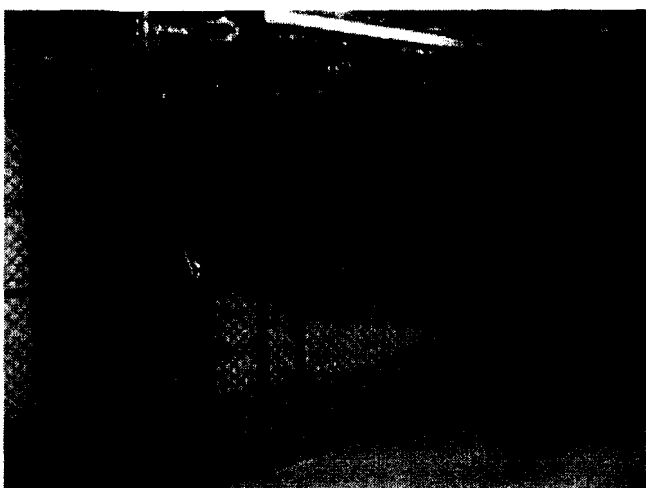
CLLI: WDRFMDWD CO: Waldorf Second Floor Collocation Room



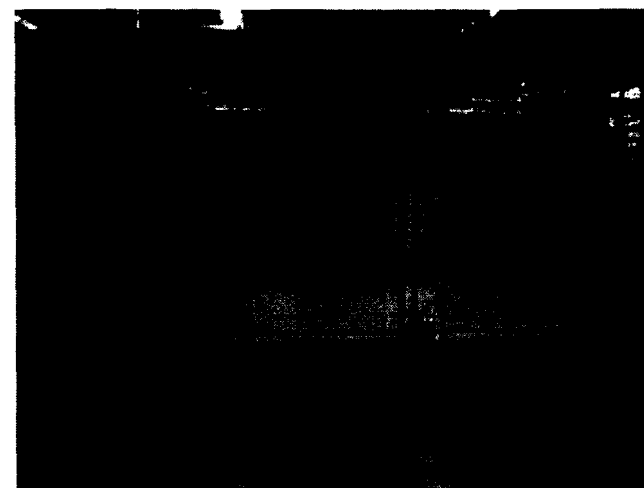
WD 02



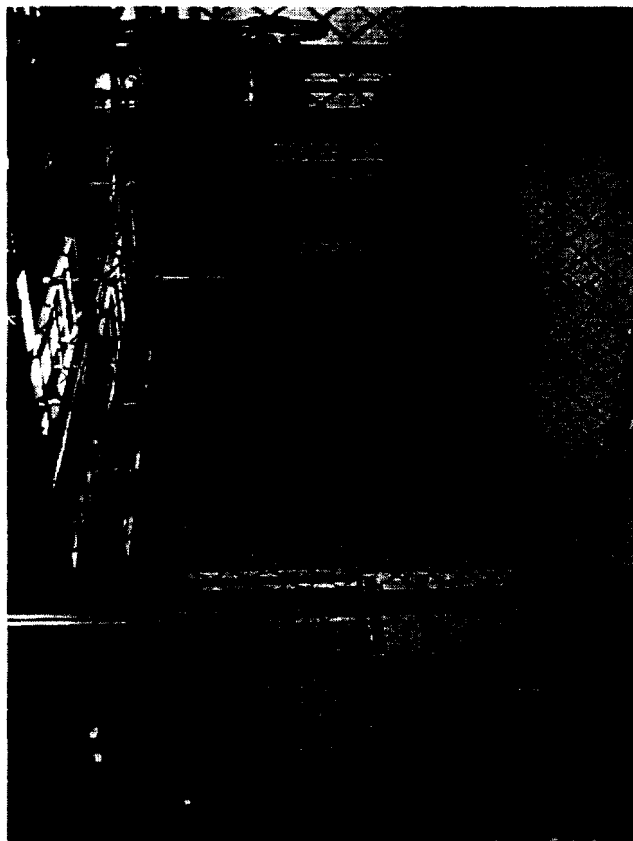
WD 03

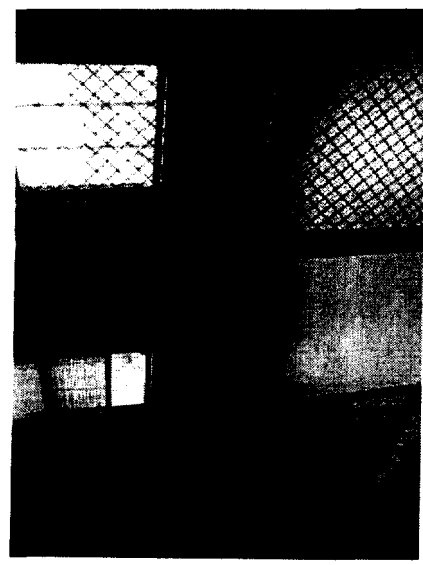
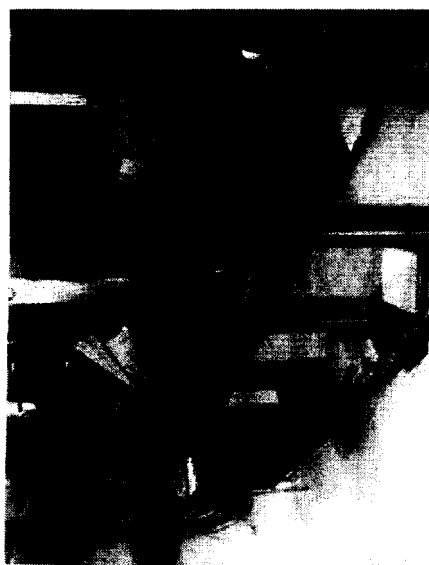
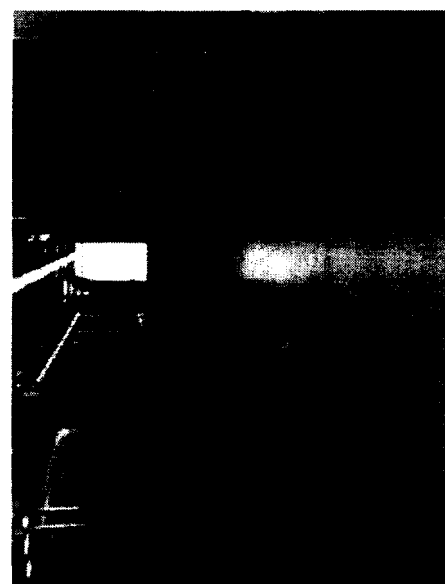
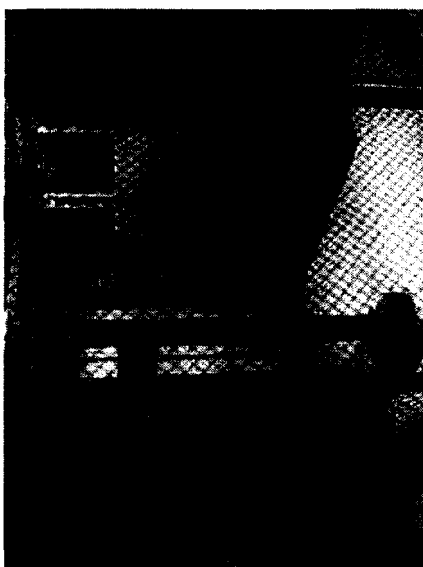
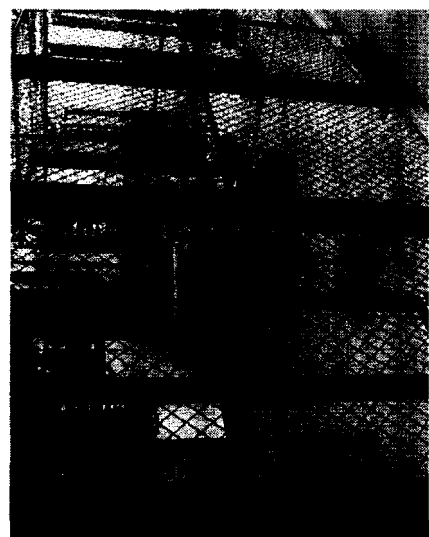
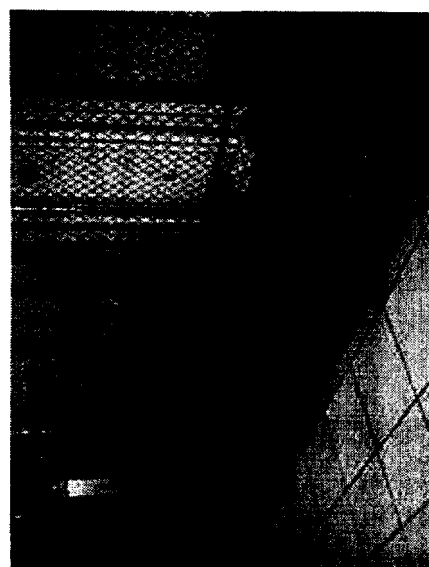
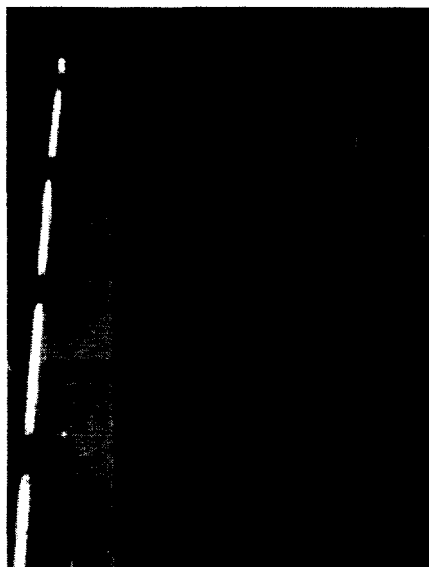


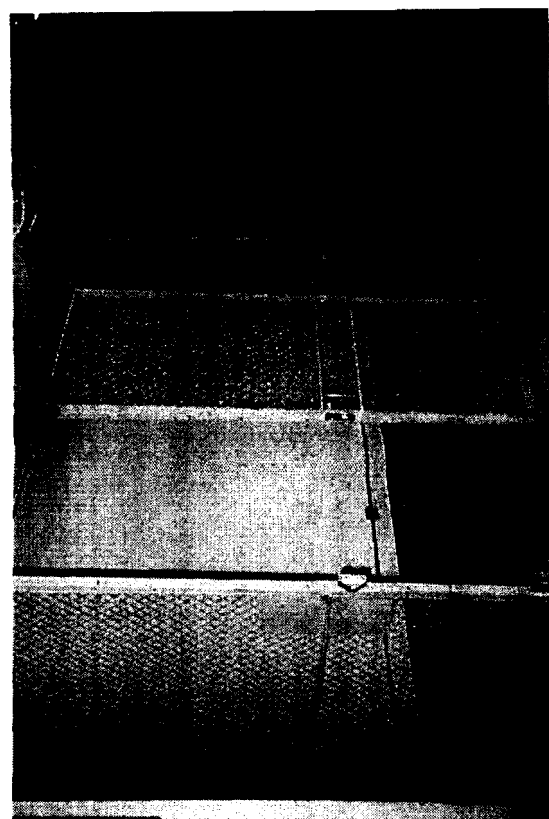
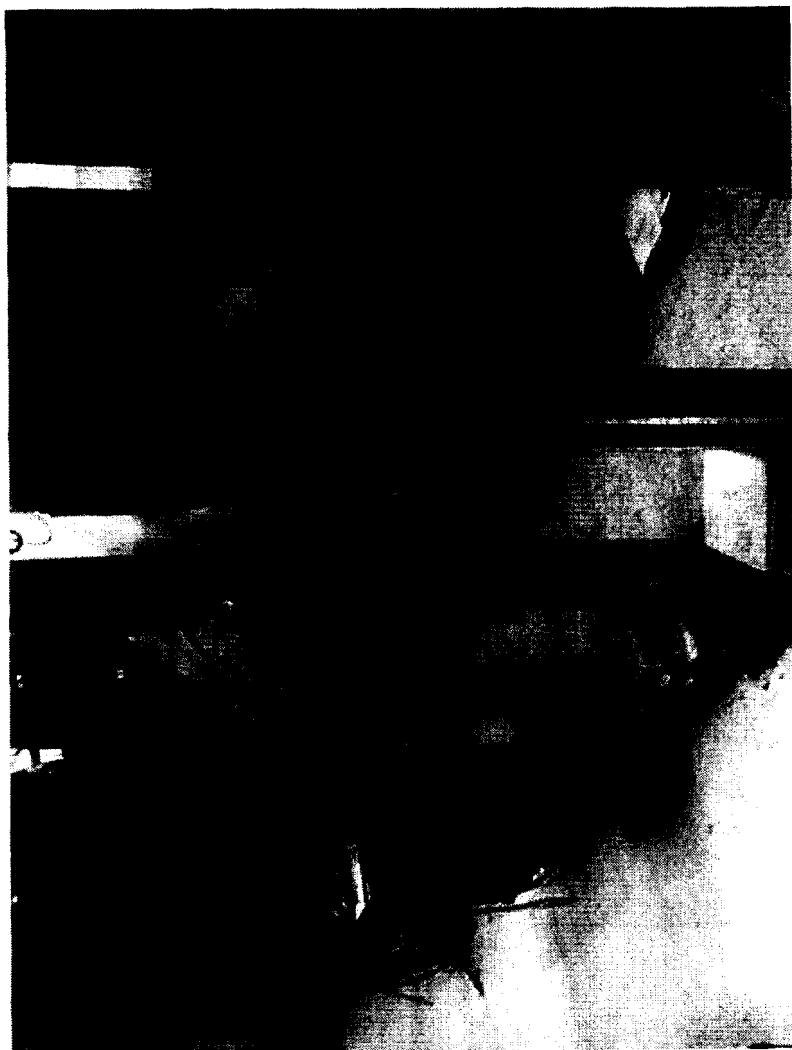
WD 04



WD 14







Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

In the Matter of	)	
	)	
Deployment of Wireline Services Offering	)	CC Docket No. 98-147
Advanced Telecommunications Capability	)	
	)	
and	)	
	)	
Implementation of the Local Competition	)	CC Docket No. 96-98
Provisions of the Telecommunications	)	
Act of 1996	)	

**ATTACHMENT B-4 TO THE DECLARATION OF MICHAEL D. POLING**

1. When Verizon designs cageless collocation space, it allocates space to accommodate equipment bays with a maximum depth of 22 inches. In addition, Verizon considers requests for equipment greater than 22 inches in depth on a case-by-case. Many of the collocators install multiple shelves in equipment bays that vary in depth from 12 inches up to a maximum of 22 inches. Most of the Digital Subscriber Loop Access Multiplexers (“DSLAMS”) supporting xDSL services are greater than the standard 12 inch depth. Exhibit 1 of this attachment is a representative sampling of the different types of equipment currently being deployed by the carriers.

2. In addition to a standard 22 inch deep bay allocation, Verizon permits collocators to install equipment in lockable cabinets. Exhibit 2 of this attachment demonstrates some of the different collocation arrangements where cabinets have been deployed in collocation.

3. Because of the additional depth of cabinets, and the door clearance requirements, these arrangements are not located in the standard 22 inch equipment aisles



designated for cageless arrangements. Verizon will typically assign space that is contiguous to building columns or adjacent to partitions or demising walls to maximize the efficient use of space within the designated collocation area. The Telcordia Network Equipment and Building Specifications require greater aisle spacing for front and rear clearance when installing equipment in cabinets. Typical front aisle clearance (maintenance aisle) must be a minimum of 36 inches to accommodate door openings on the front and rear of the cabinet.

4. The majority of Verizon's transmission equipment is configured in standard 12 inch deep relay racks. As demonstrated in Mr. Maples declaration, many of Verizon's central offices have rolling ladders that traverse the entire length of a floor. Proper aisle spacing of 36 inches for the maintenance aisle leaves little room for clearance on either side of the aisle. Placing of equipment that exceeds the maximum 12 inch dept would preclude the use of these ladders, and would expose the risk of damage to any equipment that extend beyond the floor guards of the equipment bay. Commingling of this type of equipment would not be technically feasible in a significant portion of Verizon's equipment bays and line-ups.